

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM  
POWER PRODUCTS MARKETING, SALES  
PRACTICES, AND PRODUCTS LIABILITY  
LITIGATION

No. 3:16-md-02738-MAS-RLS

**DECLARATION OF JESSICA DAVIDSON IN SUPPORT OF  
DEFENDANTS JOHNSON & JOHNSON AND LLT MANAGEMENT,  
LLC’S MEMORANDUM OF LAW IN SUPPORT OF MOTION TO  
EXCLUDE PLAINTIFFS’ EXPERTS’ GENERAL CAUSATION OPINIONS**

I, Jessica Davidson, declare as follows:

I am an attorney and a partner with the law firm Skadden, Arps, Slate, Meagher & Flom LLP, counsel for Defendants Johnson & Johnson and LLT Management, LLC (hereafter, “Defendants”) in the above-captioned matter. The facts stated in this Declaration are true of my own personal knowledge. I submit this Declaration in Support of Defendants’ Memorandum of Law in Support of Motion to Exclude Plaintiffs’ Experts’ General Causation Opinions.

1. Attached hereto as **Exhibit 1** is a true and correct copy of a Letter from Steven M. Musser, Ph.D., Deputy Director for Scientific Operations, Center for Food Safety & Applied Nutrition, to Samuel S. Epstein, M.D., Cancer Prevention Coalition, University of Illinois – Chicago School of Public Health (April 1, 2014).

2. Attached hereto as **Exhibit 2** is a true and correct copy of the transcript of the deposition of Jack Siemiatycki, March 27, 2024, in this case.
3. Attached hereto as **Exhibit 3** is a true and correct copy of the Third Amended Report of Jack Siemiatycki, May 27, 2024, in this case.
4. Attached hereto as **Exhibit 4** is a true and correct copy of the Third Amended Report of Judith Wolf, May 28, 2024, in this case.
5. Attached hereto as **Exhibit 5** is a true and correct copy of the Third Amended Report of Rebecca Smith-Bindman, May 28, 2024, in this case.
6. Attached hereto as **Exhibit 6** is a true and correct copy of the Third Amended Report of Anne McTiernan, May 28, 2024, in this case.
7. Attached hereto as **Exhibit 7** is a true and correct copy of the Report of Bernard L. Harlow, November 15, 2023, in this case.
8. Attached hereto as **Exhibit 8** is a true and correct copy of O'Brien, *Intimate Care Products and Incidence of Hormone-Related Cancers: A Quantitative Bias Analysis*, J. Clin. Oncol. (2024): JCO-23.
9. Attached hereto as **Exhibit 9** is a true and correct copy of Stayner, *Carcinogenicity of Talc and Acrylonitrile*, Lancet Oncol. (2024).
10. Attached hereto as **Exhibit 10** is a true and correct copy of the Report of Patricia G. Moorman, November 16, 2018, in this case.

11. Attached hereto as **Exhibit 11** is a true and correct copy of Penninkilampi & Eslick, *Perineal Talc Use and Ovarian Cancer: A Systematic Review and Meta-Analysis*, 29(1) *Epidemiology* 41 (2018).
12. Attached hereto as **Exhibit 12** is a true and correct copy of the Third Amended Report of Daniel L. Clarke-Pearson, May 28, 2024, in this case.
13. Attached hereto as **Exhibit 13** is a true and correct copy of the Amended Report of Michelle Cote, May 28, 2024, in this case.
14. Attached hereto as **Exhibit 14** is a true and correct copy of Wentzensen & O'Brien, *Talc, Body Powder, and Ovarian Cancer: A Summary of the Epidemiologic Evidence* 163 *Gynecol. Oncol.* 199 (2021).
15. Attached hereto as **Exhibit 15** is a true and correct copy of Gertig, *Prospective Study of Talc Use and Ovarian Cancer*, 92(3) *J. Nat'l Cancer Inst.* 249 (2000).
16. Attached hereto as **Exhibit 16** is a true and correct copy of Gates, *Risk Factors for Epithelial Ovarian Cancer by Histologic Subtype*, 171(1) *Am. J. Epidemiol.* 45 (2010).
17. Attached hereto as **Exhibit 17** is a true and correct copy of Houghton, *Perineal Powder Use and Risk of Ovarian Cancer*, 106(9) *J. Nat'l Cancer Inst.* 1 (2014).
18. Attached hereto as **Exhibit 18** is a true and correct copy of Gonzalez, *Douching, Talc Use, and Risk of Ovarian Cancer*, 27(6) *Epidemiology* 797 (2016).

19. Attached hereto as **Exhibit 19** is a true and correct copy of Chang, *Use of Personal Care Product Mixtures and Incident Hormone-Sensitive Cancers in the Sister Study: A U.S.-Wide Prospective Cohort*, 183 Environ. Int'l 1 (2024).
20. Attached hereto as **Exhibit 20** is a true and correct copy of the transcript of the deposition of Patricia G. Moorman, February 13, 2024, in this case.
21. Attached hereto as **Exhibit 21** is a true and correct copy of Micha, *Talc Powder and Ovarian Cancer: What is the Evidence?*, 306 Arch. Gynecol. Obstet. 931 (2022).
22. Attached hereto as **Exhibit 22** is a true and correct copy of Cramer, *Presence of Talc in Pelvic Lymph Nodes of a Woman With Ovarian Cancer and Long-Term Genital Exposure to Cosmetic Talc*, 110(2) Obstetrics & Gynecology 498 (2007).
23. Attached hereto as **Exhibit 23** is a true and correct copy of Moorman, *Ovarian Cancer Risk Factors in African-American and White Women*, 170(5) Am. J. Epidemiology 598 (2009).
24. Attached hereto as **Exhibit 24** is a true and correct copy of Goodman, *Quantitative Recall Bias Analysis of the Talc and Ovarian Cancer Association*, 7 Glob. Epidemiol. 1 (2024).
25. Attached hereto as **Exhibit 25** is a true and correct copy of Berge, *Genital Use of Talc and Risk of Ovarian Cancer: A Meta-analysis*, 27(3) Eur. J. Cancer Prev. 248 (2018).

26. Attached hereto as **Exhibit 26** is a true and correct copy of Langseth, *Perineal Use of Talc and Risk of Ovarian Cancer*, 62 J. Epidemiol. Community Health 358 (2008).
27. Attached hereto as **Exhibit 27** is a true and correct copy of Peres, *Racial/Ethnic Differences in the Epidemiology of Ovarian Cancer: A Pooled Analysis of 12 Case-Control Studies*, 47(2) Int'l J. Epidemiol. 460 (2017).
28. Attached hereto as **Exhibit 28** is a true and correct copy of Terry, *Genital Powder Use and Risk of Ovarian Cancer: A Pooled Analysis of 8,525 Cases and 9,859 Controls*, 6(8) Cancer Prev. Res. 811 (2013).
29. Attached hereto as **Exhibit 29** is a true and correct copy of Schildkraut, *Association between Body Powder Use and Ovarian Cancer: The African American Cancer Epidemiology Study (AACES)*, 25(10) Cancer Epidemiol. Biomarkers Prev. 1411 (2016).
30. Attached hereto as **Exhibit 30** is a true and correct copy of Rosenblatt, *Characteristics of Women Who Use Perineal Powders*, 92(5) Obstet. Gynecol. 753 (1998).
31. Attached hereto as **Exhibit 31** is a true and correct copy of Taher, *Critical Review of the Association Between Perineal Use of Talc Powder and Risk of Ovarian Cancer*, 90 Reproductive Toxicol. 88 (2019).

32. Attached hereto as **Exhibit 32** is a true and correct copy of O'Brien, *Association of Powder Use in the Genital Area with Risk of Ovarian Cancer*, 323(1) JAMA 49 (2020).

33. Attached hereto as **Exhibit 33** is a true and correct copy of the transcript of the deposition of Jack Siemiatycki, September 21, 2021, in this case.

34. Attached hereto as **Exhibit 34** is a true and correct copy of excerpts of the transcript of the deposition of Judith K. Wolf, September 13, 2021, in this case.

35. Attached hereto as **Exhibit 35** is a true and correct copy of O'Brien, *Douching and Genital Talc Use: Patterns of Use and Reliability of Self-Reported Exposure*, 34(3) Epidemiology 376 (2023).

36. Attached hereto as **Exhibit 36** is a true and correct copy of Davis, *Genital Powder Use and Risk of Epithelial Ovarian Cancer in the Ovarian Cancer in Women of African Ancestry Consortium*, 30(9) Cancer Epidemiol. Biomarkers Prev. 1660 (2021).

37. Attached hereto as **Exhibit 37** is a true and correct copy of Burke, *Executive Summary of the Ovarian Cancer Evidence Review Conference*, 142(1) Obstet. Gynecol. 179 (2023).

38. Attached hereto as **Exhibit 38** is a true and correct copy of the transcript of the deposition of Anne McTiernan, *State ex rel. Fitch v. Johnson & Johnson*, No. 25CH1:14-cv-001207 (Miss. Ch. Ct. Oct. 3, 2023).

39. Attached hereto as **Exhibit 39** is a true and correct copy of the Report of Arch Carson, November 16, 2018, in this case.

40. Attached hereto as **Exhibit 40** is a true and correct copy of Harlow & Weiss, *A Case-Control Study of Borderline Ovarian Tumors: the Influence of Perineal Exposure to Talc*, 130(2) Am. J. Epidemiol. 390 (1989).

41. Attached hereto as **Exhibit 41** is a true and correct copy of Cramer, *Genital Talc Exposure and Risk of Ovarian Cancer*, 81(3) Int'l J. Cancer 351 (1999).

42. Attached hereto as **Exhibit 42** is a true and correct copy of Rothman, *Interpretation of Epidemiologic Studies on Talc and Ovarian Cancer*, November 28, 2000.

43. Attached hereto as **Exhibit 43** is a true and correct copy of the Supplemental Report of Patricia G. Moorman, November 15, 2023, in this case.

44. Attached hereto as **Exhibit 44** is a true and correct copy of Woolen, *Association Between the Frequent Use of Perineal Talcum Powder Products and Ovarian Cancer: a Systematic Review and Meta-analysis*, 37(10) J. Gen. Intern. Med. 2526 (2022).

45. Attached hereto as **Exhibit 45** is a true and correct copy of Hill, *The Environment and Disease: Association or Causation?* 295 (1965).

46. Attached hereto as **Exhibit 46** is a true and correct copy of Gossett & del Carmen, *Use of Powder in the Genital Area and Ovarian Cancer Risk: Examining the Evidence*, 323(1) JAMA 29 (2020).
47. Attached hereto as **Exhibit 47** is a true and correct copy of the Report of Sonal Singh, November 16, 2018, in this case.
48. Attached hereto as **Exhibit 48** is a true and correct copy of the Report of Ellen Blair Smith, November 16, 2018, in this case.
49. Attached hereto as **Exhibit 49** is a true and correct copy of the transcript of the deposition of Michele L. Cote, March 21, 2024, in this case.
50. Attached hereto as **Exhibit 50** is a true and correct copy of the Supplemental Report of Sonal Singh, November 15, 2023, in this case.
51. Attached hereto as **Exhibit 51** is a true and correct copy of the Report of Sarah E. Kane, November 15, 2018, in this case.
52. Attached hereto as **Exhibit 52** is a true and correct copy of the Addendum to the Report of Bernald L. Harlow, May 28, 2024, in this case.
53. Attached hereto as **Exhibit 53** is a true and correct copy of the transcript of the deposition of Bernard L. Harlow, April 9, 2024, in this case.
54. Attached hereto as **Exhibit 54** is a true and correct copy of the transcript of the deposition of Jack Siemiatycki, January 31, 2019, in this case.

55. Attached hereto as **Exhibit 55** is a true and correct copy of excerpts of the transcript of the deposition of Judith K. Wolf, September 14, 2021, in this case.

56. Attached hereto as **Exhibit 56** is a true and correct copy of the transcript of the deposition of Rebecca Smith-Bindman, February 8, 2019, in this case.

57. Attached hereto as **Exhibit 57** is a true and correct copy of the transcript of the deposition of Sonal Singh, January 16, 2019, in this case.

58. Attached hereto as **Exhibit 58** is a true and correct copy of excerpts of the transcript of the deposition of Daniel L. Clarke-Pearson, March 8, 2024, in this case.

59. Attached hereto as **Exhibit 59** is a true and correct copy of Gabriel, *Douching, Talc Use, and Risk for Ovarian Cancer and Conditions Related to Genital Tract Inflammation*, 28(11) Cancer Epidemiol. Biomarkers Prev. 1835 (2019).

60. Attached hereto as **Exhibit 60** is a true and correct copy of Lynch, *Systematic Review of the Association Between Talc and Female Reproductive Tract Cancers*, 5 Frontiers in Toxicology 1 (2023).

61. Attached hereto as **Exhibit 61** is a true and correct copy of the transcript of the deposition of Arch Carson, January 19, 2019, in this case.

62. Attached hereto as **Exhibit 62** is a true and correct copy of Narod, *Talc and Ovarian Cancer*, 141(3) Gynecol. Oncol. 410, 411 (2016).

63. Attached hereto as **Exhibit 63** is a true and correct copy of the transcript of the deposition of Anne McTiernan, January 28, 2019, in this case.

64. Attached hereto as **Exhibit 64** is a true and correct copy of Cramer, *The Association Between Talc Use and Ovarian Cancer: A Retrospective Case-Control Study in Two US States*, 27(3) Epidemiology 334 (2016).

65. Attached hereto as **Exhibit 65** is a true and correct copy of Hanchette, *Ovarian Cancer Incidence in the U.S. and Toxic Emissions from Pulp and Paper Plants: A Geospatial Analysis*, 15(8) Int'l J. Environ. Res. Public Health 1619 (2018).

66. Attached hereto as **Exhibit 66** is a true and correct copy of the transcript of the deposition of Judith K. Wolf, January 7, 2019, in this case.

67. Attached hereto as **Exhibit 67** is a true and correct copy of Wu, *African Americans and Hispanics Remain at Lower Risk of Ovarian Cancer Than Non-Hispanic Whites after Considering Nongenetic Risk Factors and Oophorectomy Rates*, 24(7) Cancer Epidemiol. Biomarkers Prev. 1094 (2015).

68. Attached hereto as **Exhibit 68** is a true and correct copy of the transcript of the deposition of Rebecca Smith-Bindman, March 20, 2024.

69. Attached hereto as **Exhibit 69** is a true and correct copy of excerpts of the transcript of the deposition of Judith K. Wolf, January 10, 2024, in this case.

70. Attached hereto as **Exhibit 70** is a true and correct copy of the Third Amended Report of Laura M. Plunkett, May 28, 2024, in this case.

71. Attached hereto as **Exhibit 71** is a true and correct copy of the transcript of the deposition of Sonal Singh, April 4, 2024, in this case.

72. Attached hereto as **Exhibit 72** is a true and correct copy of excerpts of the transcript of the deposition of Judith K. Wolf, April 25, 2024, in this case.

73. Attached hereto as **Exhibit 73** is a true and correct copy of Mills, *Perineal Talc Exposure and Epithelial Ovarian Cancer Risk in the Central Valley of California*, 112(3) Int'l J. Cancer 458 (2004).

74. Attached hereto as **Exhibit 74** is a true and correct copy of Cook, *Perineal Powder Exposure and the Risk of Ovarian Cancer*, 145(5) Am. J. Epidemiol. 459 (1997).

75. Attached hereto as **Exhibit 75** is a true and correct copy of Rosenblatt, *Genital Powder Exposure and the Risk of Epithelial Ovarian Cancer*, 22 Cancer Causes Control 737 (2011).

76. Attached hereto as **Exhibit 76** is a true and correct copy of the transcript of the deposition of Anne McTiernan, August 19, 2021, in this case.

77. Attached hereto as **Exhibit 77** is a true and correct copy of excerpts of the transcript of the deposition of Rebecca Smith-Bindman, October 1, 2021, in this case.

78. Attached hereto as **Exhibit 78** is a true and correct copy of IARC Monographs on the Evaluation of Carcinogenic Risks to Humans, Vol. 93, Carbon Black, Titanium Dioxide, and Talc (2010).

79. Attached hereto as **Exhibit 79** is a true and correct copy of excerpts the transcript of the deposition of Daniel L. Clarke-Pearson, August 26, 2021, in this case.

80. Attached hereto as **Exhibit 80** is a true and correct copy of IARC Monographs on the Evaluation of Carcinogenic Risks to Humans, Vol. 100C, Arsenic, Metals, Fibres, and Dust (2012).

I certify under penalty of perjury that the foregoing is true and correct.

Dated: July 23, 2024



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Jessica Davidson